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December 17, 2024

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Freeman, et.al. v. Giuliani, Case No. 24-cv-6563 and 24-mc-353

Dear Judge Liman:

We are the attorneys for Defendant Rudolph W. Giuliani.

We are not counsel to Ryan Medrano, Joseph Ricci, Michael Ragusa and Robert Wagner. We cannot accept subpoenas on their behalf but have made telephone calls to assist Plaintiffs in obtaining the depositions that they seek.

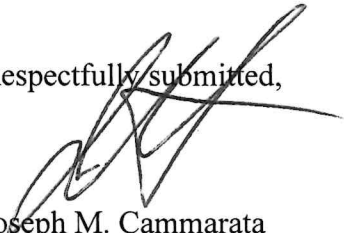
I have spoken with Dr. Maria Ryan, one of the persons whom Plaintiff's counsel seeks to depose in this action. Dr. Maria Ryan has stated that she would be amenable to be deposed and that Plaintiff's counsel should contact her directly to make the arrangements, as we are not counsel to Dr. Maria Ryan.

We have made attempts to contact Ryan Medrano, Joseph Ricci, Michael Ragusa and Robert Wagner. We will not be seeking testimony from Robert Wagner and Joseph Ricci at trial. We have a new witness that we disclosed to Plaintiffs: Monsignor Alan Placa, who will testify at trial, and who can be deposed by Plaintiff's counsel. We have been advised that Monsignor Alan Placa will make himself available to Plaintiff for a deposition.

I have been advised that Maria Ryan, Ryan Medrano, Michael Ragusa and Monsignor Alan Placa will make themselves available for a deposition by Plaintiffs. Ryan Medrano can be reached at 646-509-6069 and Michael Ragusa who can be reached at 917-920-0424. Monsignor Alan Placa's contact information is: Monsignor Alan Placa, 200 Eagleston Estate Boulevard, Palm Beach Gardens, Florida 33418.

Please be advised that interrogatories 4 and 8 have been transmitted to opposing counsel, therefore the letter motion regarding the interrogators is moot.

Respectfully submitted,



Joseph M. Cammarata